

IN THE
UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

RONALD EUGENE HOUSTON, on behalf of)
himself and others similarly situated,)

Plaintiffs,)

v.)

URS CORPORATION,)
et al.,)

Defendants.)

Civil Action No. 1:08cv0203 (AJT/JFA)

**JOINT MOTION SEEKING APPROVAL OF SETTLEMENT AGREEMENT
REACHED BETWEEN THE PARTIES, AND FOR ENTRY OF
STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE**

The Plaintiffs, Ronald E. Houston, on behalf of himself and all others similarly situated, and John Abbott, James Allison, Patricia Barrow, Ronald Lee Barts, Jamar Bates, Reginald B. Bivins, Lisa Bradshaw, Viet Bui, Romona Caldwell, Doreen Campbell, Tracy Carrasquillo, Brandon Cheek, Tamara Brunner Clarke, Andrew Cohen, Gary W. Cook, Linda Crear-Moore, D.J. Cushenberry, Ronald Daniels, Scott S. Darling, Dewanda Day, Harry J. Denton, Nicole Donaldson, Michael Duhart, Kevin C. Fuqua, Ted Geiger, Kimberlyn T. Gibson, Lynette H. Gillard, Carmaleta Gilmore, Tim Gunning, Dominic Haberman, Richard E. Haley, Suzette Montero Hall, Glenn Hampton Sr., Monique Harris, Joey Hessley, Kenneth J. Hizynski, Randall Hutchins, Carol Johnson, LaDon Kelly, Michael Kivitz, Kemonte Layton, Deborah Little, Rick MacAllister, Marcus McCranie, Lintel Malancon, Odette Morales, Tammy Myers, Stanley E. Nelson, James H. Patten, Harry Perez, Catherine L. Phillips, Derek Prograis Sr., Mia Robair, Gwendolyn Robinson, Pat Rodney, Agustin Santiago, Vance Silva, Ira B. Simmons, Eric R. Smith, Annie Smith-Jack, Lawrence S. Soroka, Gerald Stewart, Susan Stewart, John C. Swider,

Shawn Taylor, Earl Teal, Chrishelle A. Temple, Richard Thompson, Thomas R. Trimmer, Loral Tucker, Betinia L. Wade, Tanya Wallace, LaShonda Washington, Clara White and Alcide Wiltz, IV (collectively, the "Plaintiffs"), and the Defendants, Partnership for Response and Recovery and Dewberry & Davis LLC (collectively, the "Defendants"), jointly move the Court to review and approve the Settlement Agreement Containing General Releases and Waivers ("Settlement Agreement") attached as Exhibit No. 1. The Plaintiffs and the Defendants have jointly participated in the preparation of the Settlement Agreement. Both Parties have fully and finally settled this case, and have agreed, in Paragraph 2(c) of the Settlement Agreement, that the terms of this Settlement Agreement should be reviewed and approved by the Court before this case is dismissed with prejudice. In accordance with the terms of their settlement, therefore, the Plaintiffs and the Defendants request this Court to review the terms of the attached Settlement Agreement, since this case was conditionally certified as a "collective" action pursuant to Section 216(b) of the Fair Labor Standards Act of 1938, and to approve its terms as being fair to the Plaintiffs. The Plaintiffs and the Defendants also jointly seek entry of the Order approving the Settlement Agreement, attached as Exhibit No. 2, and entry of the Stipulation and Order of Dismissal with Prejudice, attached as Exhibit No. 3.

RONALD E. HOUSTON, on behalf of Himself and
All Others Similarly Situated,
et al.

By: _____ /s/ (with permission)
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